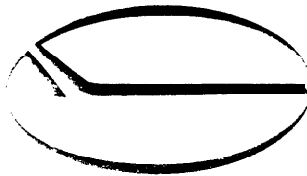


73437



Air Transport Association

OFFICE OF THE  
CHIEF COUNSEL  
RULES DOCKET

1999 AUG -5 A 9:01

FAA-99-6717-35

August 4, 1999

37

Federal Aviation Administration  
Office of the Chief Counsel  
Attention Rules Docket (AGC-10)  
Regulatory Docket No. 29547  
800 Independence Avenue, SW  
Washington, DC 20591-0001

Re: Comments for Federal Register Docket No. 29547: 207 Minute Extended Range Operations with Two-Engine Aircraft (ETOPS) Operation Approval Criteria

Ladies/Gentlemen:

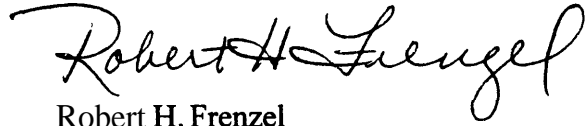
The Air Transport Association of America (ATA) respectfully submits the following comments regarding responses to our previous request to the FAA to change Extended Range Operations (ETOPS) authority beyond 180 Minutes in conjunction with two-engine operations in the North Pacific. The time for comments to the Federal Register in response to our proposed policy letter to allow 207 Minute ETOPS closed on June 18, 1999.

The reason for the proposed policy letter was, and continues to be, a question of safety and efficiency. For us, it is not a marketing question pitting two engine aircraft against four engine aircraft. It is also not a question of closing international airports. Airlines currently operating ETOPS flights in the North Pacific, as well as those starting service this year, know that this new ETOPS authority will enhance safety and service to the traveling public, address environmental concerns and provide enhanced efficiency in that critical area of operations. A close review of the additional operational constraints put into the policy letter and the associated reliability study clearly supports the safety aspects of this rationale.

We would also like to point out that, in our opinion, virtually all comments to the docket have reiterated issues that had been considered and resolved by the ATA ETOPS Subcommittee with input from member airlines, pilot associations, the FAA and other interested parties present during full forum meetings. For example, the policy letter approach to the 207 Minute ETOPS issue (similar to the 138 Minute extension to the 120 Minute ETOPS) was considered as the best approach by participating parties with the FAA present.

We look forward to your efforts to keep the processing of the policy letter on track and offer you any assistance you might need in that regard.

Very truly yours,

A handwritten signature in black ink, reading "Robert H. Frenzel". The signature is fluid and cursive, with a large, stylized "R" and "F".

Robert **H. Frenzel**  
Senior Vice President  
Aviation **Safety** & Operations

Cc: Thomas **E. McSweeney**, FAA AVR-1  
Nicholas **Lacey**, FAA AFS-1